

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Jerry Johnson	:	Chapter 13
	:	Case No. 24-12610-PMM
Debtor	:	

RESPONSE TO MOTION FOR RELIEF OF THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. The subject property is a corner property known as 557 Chester Street and/or 509 East Strawberry Street and is the Debtor's residence.
8. Admitted.
9. Denied. See answer to paragraph #7.
10. Denied.
11. Denied.
12. Denied.
13. Admitted.
14. Admitted.
15. Admitted.
16. Admitted.
17. Denied, In re Williams, 06-10928 (Bankr. E.D. Pa. 2006).
18. Admitted.
19. Denied.
20. Denied.
21. Denied. By way of further answer the subject Chapter 13 Plan intends to sell the investment property at 9 Locust Street, Lancaster, PA, to satisfy the movant's claim.
22. Denied.
23. Denied.

- 24. Denied.
- 25. Denied.
- 26. Denied.
- 27. Denied.
- 28. Denied.
- 29. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order Granting Relief from the Automatic Stay in the instant Bankruptcy matter.

Respectfully submitted,

Dated: October 02, 2024

/s/ Brad J. Sadek, Esquire

Brad J. Sadek, Esquire
Sadek Law Offices
1500 JFK Boulevard, Suite 220
Philadelphia, PA 19102
(215) 545-0008
brad@sadeklaw.com

Counsel to the Debtor